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April 22, 2021

**VIA ECF**

Honorable Sanket J. Bulsara  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Government Employees Insurance Company, et al. v. Zaitsev, et al.***  
**Docket No.: 20-cv-03495-FB-SJB**

Dear Magistrate Judge Bulsara:

We are counsel to Plaintiffs (collectively “GEICO”) in the above referenced matter. We write on behalf of all parties in this action to respectfully request Your Honor so-order the attached proposed revised confidentiality order.

As you know, Your Honor so-ordered the parties original proposed confidentiality order on April 2, 2021. See Docket Entry at April 2, 2021. However, in an effort to expeditiously produce GEICO’s claim files to Defendants, the parties have agreed to add additional provisions to the confidentiality order. Pursuant to Your Honor’s Individual Practice Rules, proposed changes to the original confidentiality order appear in red italicized font. A clean version of the proposed revised confidentiality order is also attached.

We appreciate the Court’s attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP  
*/s/ Colleen O'Neil*  
Colleen O'Neil

cc: All counsel via ECF